

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT, EASTERN DIVISION

JEFFERY GAYLON DOUGLAS,

PLAINTIFF,

Vs.

Docket Number: 1:12-cv-01276

JURY DEMANDED

FRANCINE SCHREIBER, et al.,

JENNIFER PLUNK,

RALPH TURNER,

DEFENDANT'S,

RECEIVED
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THOMAS H. GOULD
CLERK U.S. DISTRICT COURT
W.D. OF TN, JACKSON

MOTION FOR PERJURY & SUBORNATION PERJURY CHARGES

NOTICE OF DECEPTIVE ACT OR PRACTICE

Against, Schreiber, Plunk, Turner

COMES NOW, the *Plaintiff*, in accordance to **Federal Rules of Civil Procedures, Evidence; Depositions Rule 28 § 1746, 28 § 2514, T.C.A. § 39-16-701 – 703 & 705**, and submits this "*Motion For Perjury & Subornation Perjury Charges, Notice of Deceptive Act or Practice*," against Francine Schreiber, Jennifer Plunk, & Ralph Turner. The *Plaintiff* will aver the following in support of this Motion and Notice.

1. The *Plaintiff* in accordance to **F.R.Civ.Proc. Rule 10(c)**. Hereby adopts and incorporates by reference the statements and/or arguments set forth in *Plaintiff's* "Motion for Perjury Charges against Danielle Jones" and Defendant "Danielle Jones's Response **PageID 446**, **The definition of perjury**, filed before this Honorable Court.
2. The *Defendant*, Francine Schreiber, did in fact, on November 22nd, 2009, gave false testimony concerning a material matter with willful intent to provide false testimony, *rather than as, a result of confusion, mistake or faulty memory*. This willful intent, is supported by **T.C.A. § 39-16-701, Material, irrespective of its admissibility, Oath, "Official Proceedings", & Statements representation of facts.**

In additional, the Defendant has made a *False Statement*, whether under oath or not, but on an official document as to deceive under *T.C.A. § 40-38-205*. Which, was made during or in connection with an “*official proceedings*” and the false statement is material under **T.C.A. § 39-16-702**.

3. The *Defendant’s*, Jennifer Plunk &/R Ralph Turner, did in fact, on November 22nd, 2009, caused “***Subornation of Perjury***” of a false testimony in support of Schreiber concerning a material matter. This is a willful intent to provide false testimony, rather than as, a result of confusion, mistake or faulty memory. This willful intent is supported by **T.C.A. § 39-16-705**, which states, when induces another to make a “*false statement*” constituting perjury or aggravated perjury.

4. The *Defendant’s* here in, did in fact, on November 22nd, 2009, permitted Francine Schreiber to make the “False Statement” on an “official document” *T.C.A. § 40-38-205* “*Victim Impact Statement*” as follows:

1. We moved where he (*Plaintiff*) wouldn’t know where my family is living to make me feel safe.

2. My mom changed the house number and cell phone (Questionable cause).

5. Ralph Turner, owned the property at 218 Morgan Street in which Turner stated approximately two (2) or three (3) months prior to the alleged allegation by Schreiber, that “He and Plunk” were having to move. The reason given was that “he” had sold the property, including additional property “he owned”, including property on Hays Street. Therefore, the Defendant’s gave “***false testimony concerning a material matter. With willful intent to provide false testimony, rather than as a result of confusion, mistake, or faulty memory*** in accordance to the *Response by Danielle Jones* in **PageID 446**, **The definition of Perjury**. See also **PageID 55(7)**).

CONCLUSION and RELIEF SOUGHT

6. The *Plaintiff* avers that this Honorable Court, **so order**, the Madison County Clerk of Register of Deeds to **so provide this Court** and the *Plaintiff*. A copy of the Property Owner's Name, physical years 2007 – 2008 and 2008 – 2009, of Property at 218 Morgan Street, Jackson, Tennessee. In additional, the Court **so order**, same of Property “registered to and sold by” Ralph Turner for the physical years 2007 – 2008 and 2008 – 2009. This is supported by a witness for *Plaintiff* and in support of this Motion here in as evidence of perjury.

7. For all the foregoing reason set forth in this Motion, *Plaintiff* avers that the Perjury and Subornation Perjury Charges should stand in their entirety, without further response from *Plaintiff* of the subject matter now before this Honorable Court. The *Plaintiff* is “**in no form or fashion waving additional response**”. Moreover, where the response may be deemed necessary to properly answer to the Defendant's counter claim.

8. *Plaintiff* avers that this “Motion” and it relative documents should be *Granted* and this case proceeds to trial on the *Plaintiff's* behalf.

9. *Plaintiff* avers that this Honorable Court **GRANTS** the relief sought here in this pleading.

In Additional, that this Court **GRANTS** any other relief that is applicable [and/or] necessary to perform the mandatory duties of the Court [and/or] any other relief that the *Plaintiff* may be [and/or] is entitled to thereof.

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of this Document was mail 1st Class, Postage Paid, to:

1. Heather Ross
Attorney at Law
P. O. Box 20207
Nashville, TN. 37202
2. Dale Conder JR, *and/or*
Timothy G. Wehner, *and/or*
Matthew Courtner, Attorney
P. O. Box 1147
Jackson, TN. 38301-1147
3. Register of Deeds
Madison County Courthouse
100 East Main Suite 109
Jackson, TN. 38301

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jeffery G. Douglas" followed by the date "1/10/13". The signature is written over a horizontal line.

Jeffery G. Douglas, 467106

Northwest Correctional Complex

960 State Route 212

Tiptonville, TN. 38079

Rec'd

10/22/09c

VICTIM IMPACT STATEMENT

Pursuant to the Tennessee Code Annotated 40-38-205, you are afforded the opportunity to submit any statement relating to sentencing. Any statement you choose to make may be included in the presentence report, which will be filed with the court clerk. This information may be subject to the Public Records Act pursuant to the provisions in TCA, Title 10, Chapter 7, and Part 5.

This form will allow the sentencing judge and the prosecutor to know your feelings about being the victim of crime and how the crime affected you.

If you need additional space, please feel free to attach extra pages.

STATE OF TENNESSEE VS. JEFFREY GAYLON DOUGLAS
Case # 09-624 MADISON CO. DIV. II

RECEIVED
10-26-09

Charges: RAPE and SEXUAL BATTERY

Name of Victim: FRANCINE SCHREIBER

Age: 13

VICTIM'S PERSONAL REACTION: Write your feelings on how being the victim of this crime has affected you personally, as well as those around you.

- ① We moved where he wouldn't know where ~~my~~ my family is living to make me feel safe
- ② My mom changed the house number and her cell phone
- ③ I'm usure about my future life

VICTIM'S PHYSICAL AND/OR EMOTIONAL INJURY: Briefly describe any injuries (physical or psychological) and the treatment that you received. Attach copies of any medical bills.

- I'm scared a lot of times
I have had dreams from what he did to me
- ① Mr. Marshall helps me through it
 - ② Going to the YMCA helps keep my mind off it

VICTIM'S PROPERTY LOSS: List any property that was damaged, destroyed, or lost; as well as the value of that property. Attach copies of bills or estimates for repair.

FINANCIAL OR OTHER LOSS: If employed, list time off from work because of this crime and the amount of wages that you lost.

Missed School not working

COMPENSATION: List any agency or company you have made application to for replacement or to cover your loss. **PLEASE INCLUDE POLICY NUMBERS** (i.e., Insurance, Tenn Care, Crime Victim Compensation, etc.)

PLEASE LIST ANY COMPENSATION THAT YOU HAVE ALREADY RECEIVED.

RESTITUTION: Give your opinion as to whether the person convicted of the crime should pay for your loss.

Moving expenses ~~to be paid~~

SENTENCING: Although it is the responsibility of the court to impose final sentence, your opinion is important. What would you like to see happen with this case?

- ☐ Probation
- ☐ Probation with Restitution
- ☐ A Jail or Prison Sentence
- ☐ No Preference
- ☐ Other

I want him to have to stay away from ^{KIDS}

OTHER COMMENTS OR CONCERNS THAT YOU WOULD LIKE TO EXPRESS:

Mom is a server at Olive Garden and her pay is mainly tips. She has had to take time off work for counseling appointments

TO INSURE OUR CONTINUED COMMUNICATION, PLEASE REPORT ANY CHANGES OF ADDRESS/PHONE NUMBER.

SIGNATURE OF VICTIM OR REPRESENTATIVE

ADDRESS

123 Division Ave

PHONE#

256-1480

CELL #

Francine's 499-5182
Mom's 988-8429

EMAIL

francineschreiber@yahoo.com

DATE

10/19/09

RETURN FORM IN 5 DAYS TO: DISTRICT ATTORNEY OFFICE

ATTN: GEORGIA M. BOND

P.O. BOX 2825

JACKSON, TN. 38302